

**AFFIDAVIT IN SUPPORT OF  
REQUEST FOR PARTIAL ENTRY OF DEFAULT**

I, MARY NELDA G. VALADEZ, being first duly sworn, depose and say:

1. I am an Assistant United States Attorney for the Western District of Texas.
2. This Affidavit is executed by me in accordance with Rule 55(a), Federal Rules of Civil Procedure, for the purpose of enabling the Petitioner, United States of America, to obtain an entry of partial default against the Respondent \$840,000.00, More or Less, in United States Currency (hereinafter Respondent Currency), and all persons claiming an interest in said property save and except for Claimant White Energy Holding Company, LLC., for failure to timely claim, answer, or otherwise defend as to the Petitioner's Verified Complaint for Forfeiture *in rem*.
3. The Respondent Currency was seized by the United States Secret Service on December 12, 2018.
4. On March 12, 2019, the Petitioner filed a Verified Complaint for Forfeiture (Doc. 2), alleging that the Respondent Currency should be forfeited to the United States of America pursuant to Title 18 U.S.C. § 981(a)(1)(C).
5. On March 15, 2019, this Court issued an Order for Warrant of Arrest Property (Doc. 4).
6. On March 21, 2019, the Clerk of Court issued the Warrant for the Arrest of Property (Doc. 5).
7. The Warrant was executed on the Respondent Currency on June 20, 2019 (Doc. 8).
8. Notice of the forfeiture action and a copy of the complaint were sent to White Energy Holding Company LLC., via certified mail, return receipt requested and first class mail. The notice sent by certified mail, return receipt was claimed on April 29, 2019.

**Appendix A**

9. Notice of the forfeiture action and a copy of the complaint were sent to Welt & Dome Enterprises, Attn: Mike Chest, via certified mail, return receipt requested and first class mail. The certified mail was returned unclaimed, however, the first class mail was not returned.

10. Notice of the forfeiture action and a copy of the complaint was sent to CSmith Realty, Attn: Cole Smith, via certified mail, return receipt requested and first class mail. The certified mail was returned unclaimed, however, the first class mail was not returned.

11. White Energy Holding Company, LLC., filed a Claim and Answer (Docs. 7 and 9) as to the Respondent Currency.

12. On August 12, 2019, the Petitioner and Claimant White Energy Holding Company, LLC., entered into a Stipulation Agreement (Doc. 10).

13. On August 16, 2019, the Court entered an Order granting the Stipulation Agreement between Petitioner and Claimant White Energy Holding Company, LLC. (Doc. 11).

14. There are no other potential claimants for the Government to send notice to directly or to notice by publication.

15. Court records for the United States District Clerk's Office, San Antonio Division, reveal that no other claims or answers have been filed in this cause of action against the Respondent Currency, and the time for filing such has now expired.

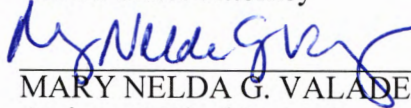
16. The undersigned Assistant United States Attorney is not aware of a minor child, incompetent person, or person in the military with an interest in the action.

17. The Petitioner's claim is for a sum certain or a sum which by computation can be made certain.

Respectfully submitted,

JOHN F. BASH  
United States Attorney

By:



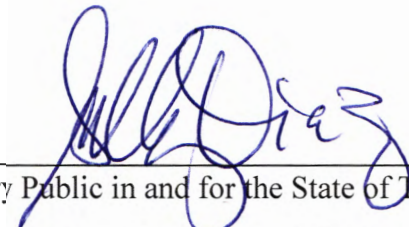
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Attorneys for the United States of America

STATE OF TEXAS )

COUNTY OF BEXAR )

Before me on the 22nd day of August, 2019, personally appeared Assistant United States Attorney Mary Nelda G. Valadez, whose signature appears above, and who swears and affirms that the information contained in the foregoing Affidavit is true and correct to the best of her knowledge.

  
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Notary Public in and for the State of Texas

